



FRED WILLIAMSON & ASSOCIATES, INC.
Telecommunications Management Services

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the Matter of)	
)	
Twin Valley Telephone, Inc.)	CC Docket 97-213
Communications Assistance for Law)	
Enforcement Act (CALEA) Extension of)	
Capability Requirements)	

PETITION FOR EXTENSION

Twin Valley Telephone, Inc. ("Twin Valley") respectfully submits this request for an extension of the June 30, 2004 deadline for compliance with the Communications Assistance for Law Enforcement Act (CALEA), for "J-Standard" and "Punch List" electronic surveillance capability with respect to their circuit-switched facilities. Specifically, Twin Valley requests the Commission to extend the deadline of compliance with respect to these capabilities until June 30th, 2006.

HISTORY

Twin Valley is a small, rural wireline local exchange carrier with six (6) exchange areas serving Barnard, Bennington, Beverly, Greenleaf, Miltonvale and Tescott, Kansas. Twin Valley has approximately 2264 access lines, serving both residential and business customers. Twin Valley qualifies as a rural telephone company under 47 U.S.C. §153(37). Twin Valley Telephone, Inc. previously participated with the Federal Bureau of Investigation (FBI) in the Flexible Deployment Program.

ARGUMENT

Presently, Twin Valley is still in the process of converting its system and deploying CALEA capabilities. The economics to justify upgrades without due consideration of the financial impact to the company as well as to its subscribers are in doubt at this time.

On May 21 2002, Twin Valley sent a letter to Stan Causy at CALEA informing him of the exorbitant costs associated with upgrading their switches. To comply, it will cost Twin Valley about \$50,000 per switch to put in DSI Modules, plus about \$700,000 - \$800,000 to upgrade all six DMS-10 switches to 502 generic.

Cost is an important factor to Section 107(c) extension determinations. Section 107(c) was enacted specifically so as to not impose on carriers undue financial burdens due to compliancy with CALEA. Therefore, Section 107(c) conditions relief on whether compliance is reasonably and financially achievable.

Because compliancy will not be achievable for these services until a financial solution is available and because the potential cost of compliancy will place an undue burden on Twin Valley, we respectfully request that the Commission accept this waiver to extend the deadline to June 30th, 2006 for Twin Valley Telephone, Inc.

CONCLUSION

Twin Valley Telephone, Inc. remains committed to incorporating CALEA-based solutions into its service areas and working with the law enforcement needs.

A copy of Twin Valley Telephone, Inc.'s *Fourth Edition* flexible deployment assistance guide template is attached as Exhibit A.

If there are any questions, please do not hesitate to contact me.

Respectfully submitted by

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